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August 2, 2017

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Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Windy City Cellular, Inc.
Initial Implementation Plan and First Progress Report
E911 Location Accuracy, PS Docket No. 07-114

Dear Ms. Dortch:

Pursuant to Section 20.18(i)(4)(i) and (ii) of the Commission's Rules, Windy City Cellular, Inc., hereby submits its initial implementation plan and first progress report on implementation of indoor location accuracy improvements.

Please contact the undersigned counsel should you have any questions.

Very truly yours,



D. Cary Mitchell
Its Counsel

Windy City Cellular, LLC

Initial Implementation Plan and First Progress Report For Implementing Indoor Wireless E911 Location Accuracy Requirements

Introduction

Windy City Cellular, LLC (“Windy City” or “the Company”) is a very small Tier III wireless carrier that provides cellular voice and data services on Adak Island, a remote community in Alaska’s Aleutian Islands that is located in an earthquake zone, in the vicinity of an active volcano and frequented by tsunamis. The Company is a minority and veteran-owned business that serves less than 50 mobile subscribers, but its services are extremely valuable to the citizens and businesses of Adak and roaming customers who visit the island. Due to the remoteness of its service area, the low population density, and the challenging weather and terrain, Windy City relies on the FCC’s high cost funding programs to maintain its wireless network. In this document Windy City describes its Implementation Plan (the “Plan”) and First Progress Report (the “Report”) toward meeting the extended location accuracy benchmarks for indoor 9-1-1 calls that the Federal Communications Commission (“FCC” or “Commission”) adopted in its *Fourth Report and Order* on Wireless E911 Location Accuracy Requirements (the “*Fourth R&O*”).¹

There are no PSAPs authorized by the State of Alaska to serve Adak, and no full-time police officers stationed on the island. The City of Adak operates a fire and EMS facility that is limited to volunteer staffing only. As of the date of this Report, however, no authorities responsible for emergency call response in Windy City’s service area have requested that the Company provide Phase II Enhanced 911 (“E911”) service. As a result, Windy City has neither procured nor installed the equipment and services necessary to generate Phase II Automatic Location Information (“ALI”) or indoor location data, and we have filed with the FCC a request for temporary waiver of the Commission’s indoor accuracy provisions and related reporting requirements.² As of the date of this report, our waiver request remains pending.

Without prejudice to its pending waiver request, Windy City provides this Plan and Report to demonstrate the Company’s awareness of and commitment to meeting the Commission’s wireless E911 indoor location accuracy requirements once a PSAP or appropriate local emergency authority in the Company’s service area is capable of utilizing such data and submits a formal request.

Indoor Location Requirements

In the *Fourth R&O*, the FCC adopted rules to improve indoor location accuracy by requiring CMRS providers to meet wireless 911 location accuracy metrics at periodic benchmarks. The substantive requirements are summarized below, and inform our company’s Implementation Plan.

¹ Wireless E911 Location Accuracy Requirements, *Fourth Report and Order*, PS Docket No. 07-114, 30 FCC Rcd 1259 (2015) (*Fourth R&O*) and rules 47 C.F.R. § 20.18(i) et seq.

² See Petition for Temporary Waiver of TelAlaska Cellular, Inc., PS Docket No. 07-114, filed May 22, 2017 (“*Petition for Waiver*”).

Horizontal Location

With respect to horizontal location, the Commission's rules require non-nationwide CMRS providers to provide (1) dispatchable location, or (2) x/y (horizontal) location within 50 meters, for the following percentages of wireless 911 calls within the following timeframes (measured from the **April 3, 2015** Effective Date of rules adopted in the *Fourth Report and Order*):

- Within 2 years (2017): 40 percent of all wireless 911 calls.
- Within 3 years (2018): 50 percent of all wireless 911 calls.
- Within 5 years (2020*): 70 percent of all wireless 911 calls.
- Within 6 years (2021*): 80 percent of all wireless 911 calls.

* NOTE: Regional, small, and rural providers are permitted extend the five and six-year deadlines based on the timing of VoLTE deployment in their networks.

Vertical Location

With respect to vertical location, the Commission's rules require non-nationwide CMRS providers to meet the following requirements:

- Within 3 years of the August 3, 2015 effective date, all CMRS providers must make uncompensated barometric data available to PSAPs from any handset that has the capability to deliver barometric sensor data.
- Within 6 years, nationwide CMRS providers must deploy either (1) dispatchable location, or (2) z-axis technology that achieves the Commission-approved z-axis metric, in each of the top 25 CMAs:
 - The National Emergency Address Database (NEAD) must be populated with a total number of dispatchable location reference points in the CMA equal to 25 percent of the CMA population if dispatchable location is used.
 - CMRS providers must deploy z-axis technology to cover 80 percent of the CMA population if z-axis technology is used.
- Within 8 years, nationwide CMRS providers must deploy dispatchable location or z-axis technology in accordance with the above benchmarks in each of the top 50 CMAs.

Filer's status: Since Windy City does not currently provide service in any of the top 50 CMAs, our company does not have any obligation to meet the dispatchable location or z-axis metric vertical location benchmarks. We expect that the E911 Phase II and indoor location solution that we implement will make uncompensated barometric data available to PSAPs from any handset that has the capability to deliver barometric sensor data.

Live 911 Call Data Reports

Quarterly reporting of live 911 data will begin no later than 18 months from the date the rules become effective (*i.e.*, February 3, 2017); CMRS providers will also provide quarterly live call data on a more granular basis that allows evaluation of the performance of individual location technologies within different morphologies (e.g., dense urban, urban, suburban, rural). Non-nationwide carriers report their aggregate live 911 call data on a semi-annual basis. Non-nationwide CMRS providers must file reports every six months for the prior two calendar-year quarters, with each report due on the first business day of the second month after the six-month period for which data is reported. See Public Safety and Homeland Security Bureau Provides Guidance to CMRS Providers Regarding Submission of Periodic E911 Location Accuracy Live Call Data Reports, *Public Notice* DA 17-82.

Filer's Implementation Plan

Our company's Implementation Plan for meeting the Commission's extended location accuracy benchmarks for indoor 9-1-1 calls as adopted in the *Fourth R&O* follows below. As a very small Tier III service provider, Windy City does not have the resources to participate in the standards and technology development process in the same way as Tier I and many Tier II companies, and we must rely on third-party vendors (*i.e.*, companies such as West Security Services) to develop, test and implement solutions that are consistent with industry standards and that allow us to timely meet the Commission's E911 and indoor location benchmarks.

Upon receipt of a valid request for E911 service, Windy City anticipates that it will enter into a services agreement with an appropriate vendor allowing it to implement E911 service and provide indoor location data in accordance with the Commission's Rules, including submission of periodic reports and compliance certifications to the FCC, including:

- [Live 911 Call Data Reports - §20.18 \(i\)\(3\)\(ii\)](#)
- [Horizontal Location - §20.18 \(i\)\(2\)\(i\)](#)
- [Vertical Location - §20.18 \(i\)\(2\)\(ii\)](#)
- [Plans and Reports filed in PS Docket No. 07-114 - §20.18 \(i\)\(4\)\(i\)](#)
- [Additional Reporting/Compliance – as necessary or upon PSAP request:](#)

Latency: As of April 3, 2015, for purposes of measuring compliance with the location accuracy standards, a call will be deemed to satisfy the standard only if it provides the specified degree of location accuracy within a maximum latency period of 30 seconds, as measured from the time the user initiates the 911 call to the time the location fix appears at the location information center. [47 C.F.R. §20.18(h)(3)].

Confidence and Uncertainty Data ("C/U Data"): Upon a PSAP request, providers must submit for all wireless 911 calls (indoor/outdoor), x- and y-axis confidence and uncertainty information on a per-call basis, with a confidence level of 90%.

Provision of Live 911 Call Data for PSAPs: CMRS providers must record tracking data on all live 911 calls (including the positioning source method used to provide a location fix), along with the confidence and uncertainty data, which must be made available to PSAPs upon request and must be retained for 2

years. This requirement is separate from, and in addition to, the provisions for recurring reporting, as mentioned above. [47 C.F.R. §20.18(k)].

First Progress Report

As noted above, Windy City has not yet received a valid request for E911 service and it has not used its limited resources to procure and install/implement the necessary equipment and services necessary to generate Phase II ALI or indoor location data in the absence of a capable PSAP. Upon receipt of a valid PSAP request, Windy City will enter into a E911 Phase II service arrangement with an appropriate vendor and deliver Phase II and indoor location data to the requesting PSAP.

Please direct any questions concerning this report to our counsel, Mr. Cary Mitchell, of the law firm of Blooston Mordkofsky Dickens Duffy & Prendergast, LLP. He can be reached by telephone at (202) 828-5538, or by email at cary@bloostonlaw.com.

8/2/17

Dated

Andilea Weaver

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